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9 Attorneys for Plaintiff  
**STEPHEN LAMBERT**

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

14 STEPHEN LAMBERT, ) Case No. C11-00725 MMC (EL)  
15 )  
16 Plaintiff, )  
17 vs. )  
18 UNITED STATES OF AMERICA; )  
19 MAERSK; MAERSK LINE, LTD; )  
20 MAERSK LINE, )  
Defendants. )  
STIPULATION AND  
[PROPOSED] ORDER TO  
AMEND THE SCHEDULING  
ORDER REGARDING  
DESIGNATION OF EXPERTS  
AND EXPERT WITNESS  
DISCOVERY

WHEREAS, the Court, in its Status Conference Order Setting Time for Compliance with Certain Rules of Court, dated June 17, 2011, [hereinafter "Order"] set May 30, 2012 as the day of "expert discovery cut-off";

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1           WHEREAS, counsel has attempted to schedule expert depositions during this time  
2 but various scheduling difficulties have prevented the depositions from taking place. The  
3 parties are seeking a short extension.

WHEREAS, the parties, by and through their counsel of record, have agreed and  
therefore stipulate to request that the Order be amended as follows:

7 June 8, 2012 Last day for all parties to complete expert discovery and expert witness depositions (Expert Discovery Cut-Off)

9 | Dated: 7 May 2012

LAW OFFICES OF JOHN FITZPATRICK VANNUCCI  
BIRNBERG & ASSOCIATES

City A. Bittsberg  
Attorneys for Plaintiff, STEPHEN LAMBERT

14 || Dated: 7 May 2012

U.S. DEPARTMENT OF JUSTICE

Attorneys for Plaintiff, STEPHEN LAMBERT

U.S. DEPARTMENT OF JUSTICE

By: /s/Vickey Quinn

By: Vickey Quinn

Vickey L. Quinn  
Torts Branch, Civil Division (Admiralty)

**Forts Branch, Civil Division (Admiral  
West Coast and Pacific Rim Office)**

Attnorneys for Defendant  
UNITED STATES OF AMERICA

APPROVED AND SO ORDERED.

22 | Dated: May 9, 2012

By: Mayine M. Chebey  
The Honorable Elizabeth D. Lippolis  
United States Magistrate Judge  
Northern District of California

Maxine M. Chesney  
United States District Judge

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